

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**BRANDON PERRONE,**

Civ. No. 6496/07

Plaintiff,

**PLAINTIFF'S  
RULE 26(a)(1)  
INITIAL  
DISCLOSURE**

-against-

**COMMERCIAL ELECTRICAL CONTRACTORS, et al.  
and PEDRO CASTRO,**

Defendants.

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**BRANDON PERRONE'S RULE 26(a)(1) INITIAL DISCLOSURE**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Brandon Perrone ("Perrone") makes the following initial disclosure:

**A. Individuals Likely To Have Discoverable Knowledge**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), Brandon Perrone discloses the following persons who may have information that Plaintiff may use to support his claim or defenses. Unless otherwise indicated, the persons listed below may be contacted through Plaintiff's Counsel Alan Serrins.

**1. Arthur Lolith, Supervisor of Commercial Electrical Contractors, Inc.**

Mr. Lolith may have discoverable information relating to the instant Complaint, because Mr. Perrone complained to him that Defendant Castro kept touching him inappropriately by groping his buttocks.

**2. Defendant Pedro Castro.**

3. John Totusa, business representative for Local Union #3 at 58-11 Harry Van Arsdale Avenue, Flushing, NY 11365. Mr. Totusa may have discoverable information relating to the instant Complaint, because Mr. Perrone complained to him regarding the false accusation and inappropriate contact made by Castro.

4. Ciro Lupo, CEO of Commercial Electrical Contractors, Inc.

5. Vincent Sagistiano, co-worker of Brandon Perrone who was falsely accused of smoking marijuana on the job.

#### B. Potentially Relevant Documents

Brandon Perrone may use documents relating to his employment, termination, correspondence between himself and Defendants, correspondence by Apprentice Department, and payroll documents from Commercial Electrical Contractors, Inc. to support his claims in this action. These documents are in custody and control of the Plaintiff.

Unless otherwise indicated, the referenced documents presently are maintained at Plaintiff's Counsel located at 233 Broadway, 18<sup>th</sup> Floor, New York, NY 10279. None of the Plaintiff's relevant records are maintained electronically.

Brandon Perrone reserves his right to supplement these disclosures as he acquires further information through discovery or investigation.

#### C. Computation of Damages

Plaintiff is seeking damages in accordance with provision of 42 U.S.C. § 2000e *et seq.* ("Title VII"), the New York State Human Rights Law, Executive Law § 290 *et seq.* ("Human Rights Law"), and the Administrative Code of the City of New York § 8-801 *et*

*seq.* ("City Law") which include back-pay, front-pay, mental anguish pain and suffering, attorney's fees, costs and punitive damages.

D. Insurance Agreements

Not applicable.

October 26, 2007

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Attorneys for Plaintiff



Alan Serrins, Esq.